

PETER HSIAO (Bar No. 119881)  
*phsiao@kslaw.com*  
ALEXANDER MOORE (Bar No. 340994)  
*amoore@kslaw.com*  
**KING & SPALDING LLP**  
50 California Street, Suite 3300  
San Francisco, CA 94111  
Telephone: +1 415 318-1200  
Facsimile: +1 415 318 1300

*Attorneys for Defendants*  
TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

## CALIFORNIANS FOR ALTERNATIVES TO TOXICS.

**Plaintiff,**

VS.

TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA.

## Defendants.

Case No. 3:24-CV-06632-SI

**DECLARATION OF ALEXANDER  
MOORE IN SUPPORT OF  
STIPULATED REQUEST FOR ORDER  
EXTENDING INITIAL CASE  
MANAGEMENT DATES (L.R. 6-1, 6-2)**

*[Filed concurrently with Stipulated Request]*

*Assigned for all purposes to the  
Honorable Susan Illston*

**DECLARATION OF ALEXANDER MOORE**

I, Alexander Moore, declare and state as follows:

1. I am an associate at King & Spalding LLP and am licensed to practice  
2 law in the State of California. I represent Travis Moreda and Travis Moreda Dairy  
3 (collectively, “TMD”) in the above-captioned matter. I have personal knowledge of  
4 the facts set forth herein, and if called as a witness I could and would competently  
5 testify thereto.

6 2. On November 22, 2024, the Court granted TMD’s Motion to Extend  
7 Time, extending TMD’s time to respond to the Complaint from November 25, 2024  
8 to December 27, 2024, and extending all deadlines set by the Court’s Initial Case  
9 Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11).

10 3. On January 2, 2025, the Court granted TMD’s Unopposed Motion for  
11 Extension of Time to File Answer, extending TMD’s time to file its Answer from  
12 December 27, 2024 to December 30, 2024 (ECF No. 15).

13 4. On January 27, 2025, the Court granted the parties’ Stipulated Request  
14 to Extend Deadlines Set by Court, extending the deadline for the Parties’ joint case  
15 management statement until April 11, 2025, and setting the Initial Case Management  
16 Conference for April 18, 2025 (ECF No. 19).

17 5. The parties have and continue to engage in good-faith settlement  
18 discussions and have exchanged settlement proposals.

19 6. On March 28, 2025, the parties met and conferred and agreed to engage  
20 in an Early Settlement Conference with a U.S. Magistrate Judge.

21 7. On April 4, 2025, the parties filed a Stipulation and [Proposed] Order  
22 Selecting ADR Process (ECF No. 20).

23 8. Also on April 4, 2025, the parties timely exchanged their initial  
24 disclosures as required by Federal Rule of Civil Procedure 26.

9. The parties believe the Early Settlement Conference will facilitate settlement discussions and may resolve this case while conserving the expenditure of attorneys' fees and costs in litigation.

10. The parties therefore jointly request a continuance of the Initial Case Management Conference for approximately 90 days, to a date convenient for the Court's calendar, and a corresponding continuance of the deadline for the joint case management statement, so that the Parties may first proceed with the Early Settlement Conference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 8th day of April 2025, in San Francisco, California.



Alexander Moore